

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

NEUROSURGICAL CARE, LLC,

Plaintiff,

v.

BIEGLER GMBH; SOLACE
ADVANCEMENT, LLC; JAMES W.
CARPENTER; DOC SOLUTIONS LLC;
MARK KAISER; LIZ O'NEILL; ABC
CORPS 1-50; and JOHN DOES 1-50,

Defendants.

Case No. 2:19-cv-05751-JMY

JOINT STIPULATION

It is hereby STIPULATED and AGREED by and between the undersigned counsel for Plaintiff Neurosurgical Care, LLC, and Defendant Elizabeth O'Neill (collectively referred to as "Parties"), and pursuant to Fed. R. Civ. P. 6(b) and Local Rule 7.4(b)(2) as follows:

1. Plaintiff and Defendants, Doc Solutions, LLC, Mark Kaiser and Liz O'Neill, are actively engaged in settlement discussions that these Parties anticipate concluding within the next 45 days.

2. As a result, these Parties seek to extend the deadline for Plaintiff to respond to Defendant Liz O'Neill's Motion to Dismiss (ECF No. 36) from June 5, 2020 to July 31, 2020, unless a settlement is reached and the Motion withdrawn.

3. No other deadline is being modified by this Joint Stipulation, so all remaining deadlines set forth in ECF No. 50 remain in full force and effect.

IT IS SO STIPULATED AND AGREED.

<u>/s/ Oliver Benton Curtis, III</u> Oliver Benton Curtis, III McDermott Will & Emery LLP 333 SE 2nd Ave, Suite 4500 Miami, FL 33131 <i>Attorney for Defendants, Doc Solutions, LLC, Mark Kaiser, and Elizabeth O'Neill</i>	<u>/s/ Simon B Paris</u> Simon Bahne Paris, Esquire Saltz Mongeluzzi & Bendesky, P.C. 1650 Market St., 52nd Floor Philadelphia, PA 19103 Tel: (215) 496-8282 <i>Counsel for Plaintiff, Neurosurgical Care, LLC</i>
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SO ORDERED.

Dated: May 28, 2020

/s/ John Milton Younge
Judge John Milton Younge